

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION

NATALIE ANDERSON and  
ANDRE BISASOR,

Plaintiffs,

v.

TODISCO SERVICES, INC., PASQUALE  
TODISCO, III, MATTHEW MAZZARELLA,  
DON “DOE,” BILLY “DOE,” MAPFRE  
INSURANCE CO., STEPHANIE WOJDAG,  
DANIEL OLOHAN, ACADIA INSURANCE  
GROUP, BENNETT & BELFORT, and JITEN  
MANAGEMENT,

Defendants.

C. A. No. \_\_\_\_\_

**NOTICE OF REMOVAL**

Pursuant to 28 U.S.C. §§ 1441 and 1446, Defendant Pasquale Todisco, III (“Mr. Todisco”) by and through his undersigned counsel, hereby give notice that he removes to this Court the case pending in the Attleboro District Court, Massachusetts titled *Natalie Anderson v. Todisco Services, Inc. et al*, C.A. No. 2234CV730152 (the “Action”), to the U.S. District Court for the District of Massachusetts. Mr. Todisco removes the Action by special appearance without waiving any defenses or objections.

Removal is authorized by 28 U.S.C. §§ 1331 and 1441, and is based on the District Court’s original jurisdiction of claims arising under the laws of the United States. In further support of this Notice, Mr. Todisco states:

1. The Action was commenced by Plaintiff Natalie Anderson, a.k.a. Natalie Andersen, (“Ms. Anderson”), on February 22, 2022, in the Superior Court for Bristol County,

Massachusetts, where it was assigned docket number 2273CV00152. Thereafter, on or about July 11, 2022, the Action was transferred to the Bristol County Superior Court, where it was reassigned docket number 2234CV30152. On June 27, 2023, Ms. Anderson filed an Amended Complaint in the Bristol Superior Court, in which she added Andre Bisasor (“Mr. Bisasor”) as a co-Plaintiff. The Amended Complaint averred a federal question, i.e. a claim under the Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. § 1961 *et seq.*, for the first time in the Action.

2. A true and accurate copy of the Amended Complaint is filed herewith as **Exhibit A**.

3. Mr. Todisco received service of the Amended Complaint on June 28, 2023, by delivery at his last and usual place of abode. This was the first time that Mr. Todisco was served with a copy of any complaint in the Action, in any of the courts in which it was pending.

4. This Notice of Removal is timely filed with this Court within thirty (30) days of Mr. Todisco’s receipt of the service of the Amended Complaint on June 28, 2023. Removal is therefore timely pursuant to 28 U.S.C. § 1446. After a diligent search of court records, calling the court and attempting to call counsel who may be representing other parties, all parties who are known to have been served have consented to removal of this action.

5. This Court has original jurisdiction over the Action pursuant to 28 U.S.C. § 1331, and the Action is removable pursuant to 28 U.S.C. § 1441(a) in that the Amended Complaint includes claims for alleged violations of the Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. § 1961 *et seq.*, which gives rise to this Court’s original jurisdiction over actions arising under the laws of the United States. *See* Amended Complaint at pp. 33-35. This Court has supplemental jurisdiction over the remaining claims stated in the Amended Complaint.

6. Pursuant to 28 U.S.C. § 1446(d), copies of this Notice of Removal will be promptly filed with the Clerk of the Attleboro District Court and served upon Plaintiffs.

Respectfully Submitted,  
Pasquale Todisco, III, Defendant,  
By His Attorneys,

Dated: July 12, 2023

/s/ Michaela C. May  
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**CERTIFICATE OF SERVICE**

I certify that this document filed through the ECF system will be served electronically to the registered participants as identified on the Notice of Electronic Filing [NEF] and paper copies will also be served via e-mail and first-class U.S. Mail to the registered and non-registered participants on this date.

Natalie Anderson  
Andre Bisasor  
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Attleboro, MA 02703  
Liberty\_6@msn.com

/s/ Michaela C. May  
Michaela C. May